

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Laurie Ortolano,  
Plaintiff,**

**v.**

**The City of Nashua, *et al.*,  
Defendants.**

**Civil Action No. 1:22-cv-00326-LM**

**AFFIDAVIT OF CELIA K. LEONARD**

Celia K. Leonard hereby deposes and says:

1. I am a Deputy Corporation Counsel for the City of Nashua and an attorney in good standing admitted to the bar of the State of New Hampshire.

2. Our office has assisted the City of Nashua with responses to over 1,000 right-to-know requests from the Plaintiff over the last few years, producing over 40,000 pages of documents, and defended more than one dozen NH RSA 91-A claims in, to date, sixteen lawsuits filed by Plaintiff in state superior court.

3. The Legal Department office suite is not open to the public, has locked entry doors, and does not date stamp abatement applications. The role of the Legal Department had been explained to Plaintiff on or before September 11, 2019, and Plaintiff stated that "You made very clear that legal is only there to address specific document requests and I should not bring any other information of [sic] concerns regarding the City to the attention of the legal office." See Exhibit B-1.

4. On Wednesday, January 20, 2021, the City's then Chief Assessor, Mr. Vincent, emailed Plaintiff to tell her that he would get the abatement applications date-stamped for her. See Exhibit B-2.

5. At the time of Plaintiff's January 22, 2021 trespass, City Hall still had a few Covid-19 restrictions in place.

6. I arrived at the Legal Department on January 22, 2021 and was confronted by Plaintiff sitting on the floor in front of my office.

7. I told Plaintiff she was trespassing and needed to leave.

8. The police arrived at the Legal Department, and escorted Plaintiff out of the Legal Department.

9. The Nashua Police Department informed Plaintiff that "she [was] being trespassed from City Hall and only allowed in the building with an approved appointment." She was advised that she could face arrest from Criminal Trespass if she attends City Hall without an appointment. This was confirmed with me.

10. Plaintiff commented that "she would probably be arrested as she would be back."

11. After an investigation into the incident, the Nashua Police Department arrested the Plaintiff for criminal trespass.


12. I, along with Attorney Neumann and Mindy Lloyd, were the victims of Plaintiff's criminal trespass.

Date: March 28, 2024

  
\_\_\_\_\_  
Celia K. Leonard

STATE OF NEW HAMPSHIRE  
COUNTY OF HILLSBOROUGH

Subscribed and sworn to before me by Celia K. Leonard, this 28 day of March, 2024.

  
\_\_\_\_\_  
Notary Public/ Justice of the Peace  
Print Name:  
My Commission Expires: \_\_\_\_\_

